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5 ATTORNEYS FOR Debtor

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8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
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11 In re:) Case No. 13-53491
12 272 E SANTA CLARA GROCERY, LLC,) CHAPTER 11
13 Debtor.) **DECLARATION OF WILLIAM J.**
14) **HEALY RE: AMENDED OBJECTION**
15) **TO PROOF OF CLAIM OF BOSTON**
16) **PRIVATE BANK & TRUST COMPANY**
17) **(Claim No. 2)**
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I, William J. Healy, do hereby declare:

1. I am an attorney at law duly licensed to practice before all the courts of the State of California and several districts and divisions of the United States District Court in the State of California, including this court. I am a member of the law firm of Campeau Goodsell Smith, attorney herein for Debtor 272 E SANTA CLARA GROCERY, LLC ("Debtor").
2. I submit this declaration of my own personal knowledge except as to those matters upon which I am informed and believe and as to those matters I am informed and believe them to be true. If called to testify as to the matters stated herein I could do so in an honest and competent manner. At no time do I intend to waive the attorney client and work product privileges.

1 3. This declaration is submitted as part of Debtor's AMENDED OBJECTION TO PROOF
2 OF CLAIM OF BOSTON PRIVATE BANK & TRUST COMPANY (Claim No. 2) ("Objection").

3 4. I prepared the Objection based on information and documents obtained from Debtor,
4 from Debtor's testimony at the Meeting of Creditors, from Debtor's schedules, from Debtor's
5 state court counsel (Rossi, Hamerlough, Resichl & Chuck), matters subject to judicial notice,
6 information generally available to all interested parties, and information and pleadings
7 attached to matters subject to judicial notice or generally available to all interested parties. To
8 the best of my knowledge the information contained in therein is true and correct.

9 5. The Objection's references to the court's docket were pulled directly from the court's
10 docket. Only true and correct copies of the referenced documents are attached to the related
11 request for judicial notice.

12 6. I believe that substantial additional evidence in support of the Objection exists with
13 BPB, with its predecessor Borel Bank & Trust Company ("Borel"), and third parties and
14 includes, but is not limited to, confirmation of Debtor's assertions of facts, support of
15 Debtor's assertions of facts, and contradiction of BPB's assertions of fact.

16 I declare under penalty of perjury that the foregoing is true and correct and that this
17 declaration was executed at San Jose, California, on December 13, 2013.

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19 /s/ William J. Healy
20 William J. Healy
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